

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)
)
Amendment of Part 97 of the Commission's Rules) **WT RM-11775**
Amateur Service Rules to amend amateur radio)
rules to prohibit frequent vanity call sign changes)

To: The Commission

Comments of Stephen J. Melachrinis, W3HF

Stephen J. Melachrinis is a licensed Amateur Radio Operator, licensee of station W3HF. These comments are timely filed in the matter stated above, and respectfully submitted for Commission consideration.

Summary:

- I agree with the filer's assertion that the vanity call sign system is being abused by certain licensees, with the consequence being multiple call signs that are not available to be re-issued because they are within the two-year window.
- I agree with the filer's implied assertion that in the absence of more aggressive enforcement (which may not be possible given the Commission's current staffing), a rules change should be considered.
- I do not agree with the filer's specific recommendation, and instead offer alternate concepts.

Discussion:

1. It's clear that the vanity process is being exploited by certain licensees who churn through multiple callsigns rapidly, effectively removing those calls from circulation for the two-year waiting period. This is especially significant for 1x2 and 2x1 calls, where very few calls exist (20,280 1x2s and 23,400 2x1s within the FCC's definition of Group A calls), and virtually none that stay vacant for more than a few days (other than regions 11/12/13). Whether that "exploitation" constitutes "abuse" is likely a matter of perspective. The applicants may take the position that the rules allow it, so therefore it is not abuse. My opinion is that there are a few situations where some "churn" may have a legitimate explanation, but many cases appear to be deliberate attempts to remove callsigns from the pool of available-for-reissue calls. And if that is the purpose, then they rise to abuse.

2. There are existing tools that can help identify the abusive cases. For example, Dean Gibson (AE7Q) has a page on his web site (<http://www.ae7q.com/query/list/GenLicMulti.php?COUNT=7&INDV=I>) that lists 179 amateur licensees (as of 14 November 2016) with at least 7 license records in the ULS.

Some clearly show patterns of callsign churning that would constitute abuse; others are more benign. Rather than catch the abusers *a posteriori*, though, a rules change should be considered to help prevent at least some of the cases. Putting reasonable rules in place to prevent the most egregious abuse cases would allow the FCC to allocate scarce enforcement resources to cases that require hands-on enforcement. The key is defining patterns that constitute abuse.

3. There are many reasons why amateur radio licensees request vanity callsigns. Mr. LaRue has identified one of these reasons, but there are many others. Many applicants desire callsigns based on their name, initials, or locations. Some (including the undersigned) indicate an interest in a certain type of amateur radio operation. Others want to honor a former holder (either family member or friend) who is deceased, or want to reclaim a callsign they once held in the past. Some simply want a callsign that reflects their current call district (as mentioned by other commenters in this proceeding). Others simply want a callsign that is perceived to be better for on-the-air operation, either shorter, or better phonetics, or lower CW weight. And some desire to “undo” a recent callsign change that they no longer desire, a “buyer’s remorse” situation. Many of these other reasons could be unexpectedly triggered during a licensee’s initial ten-year term of a vanity grant—e.g., relocation of residence, death of a family member, or recent availability of a “more preferred” callsign. Mr. LaRue’s proposal would prevent these legitimate applications that have nothing to do with the abuse he intends to remedy. I believe that any remedy that negatively impacts other legitimate reasons should be avoided if there are other remedies that effect the same result, and for this reason, I do not support Mr. LaRue’s proposed change.

4. A number of other commenters have suggested an alternate approach of immediately “releasing for reassignment” previous callsigns when a vanity callsign is granted, i.e., eliminating the two-year waiting period for callsign reassignment for all previous callsigns held by a vanity applicant. This approach, however, impacts the legitimate “buyer’s remorse” situation. I would suggest that all but the most recent callsign be released, preserving an applicant’s opportunity to return to his/her most recent callsign if a recent callsign action is “not what was expected.” This variation (by itself) would prevent much of the multi-callsign abuse that Mr. LaRue has identified, but would not eliminate the simple case of a licensee “ping-ponging” between two callsigns to keep both out of circulation. To address this special case, I would suggest limiting applicants to one “buyer’s remorse” application per callsign, i.e., allowing only one “round trip” out of and back into a given callsign within the two-year waiting periods. This would protect the legitimate applicants, and sharply limit the effectiveness of the strategy by callsign hoarders.

Respectfully submitted,

/s/ Stephen J. Melachrinios
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